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Subject: FAFB PFOS/PFOA QAPP Deviation
Date: Monday, May 15, 2017 1:20:21 PM

Kim,

Quick email to follow up our discussion Friday afternoon: Our SI contractor (AMEC) sample team accidentally did not follow the QAPP monitoring well purging procedures at MW-117 and MW-127. Instead of collecting the purge water for disposal, they released the purge water to the ground near each well (approx. 10 gal at MW-127 and approx. 27 gal at MW-117).

I looked at our most recent quarterly monitoring and annual reports. We do not have any current data for MW-127 since we have been only using it for WL for several years. MW -127 sits close to and is in the same alluvial scour channel as public supply well PS1/4 that we monitor quarterly and has consistently stayed below PALs for our many years of monitoring the well. MW-117 is on a bi-annual sample schedule and its most recent events (and I believe many years of same) below PAL are being used to describe the MCL line to the north of its location. Not certain of date of last sample, but can track that down if you think its important.

I believe in each case we released groundwater that would otherwise be considered suitable for drinking water. We have informed our environmental compliance staff to review other environmental compliance rules, but I see no reportable quantity issue and I believe a courtesy notice on deviation of the CERCLA QAPP (albeit technically not "approved" by EPA and for an unregulated compound) may be appropriate short-term action?

We will document the deviation in the SI report that becomes part of the Admin Record.

Please let me know if you need additional information or you believe we should be taking other actions.

//SIGNED//

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